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## **MEMORANDUM**

SUBJECT: Preliminary Assessment and Site Investigation Downtown Wells Site and Former

Electrolux Site; Jefferson, Iowa – Approved with Condition

FROM: Diane Harris

Regional Quality Assurance Manager

**ENST/IO** 

TO: Brian Mitchell

EPA Project Manager

Land, Chemical & Redevelopment Division

RCRA Oversight Authorization Grants & PCB Branch

The review of the subject document prepared by Tetra Tech, Inc. and dated 10/10/2019 has been completed according to "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001.

Based on the comments below, the document is approved with condition. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

## **Critical Comments**

- 1. § 2.5 Quality Control Requirements, page 3 of 5. The last sentence of this section states no field duplicates will be collected but the previous paragraph, Table 1, and page 9 of Appendix A do indicate the collection of a field duplicate. The collection of field duplicates needs to be verified and the QAPP updated accordingly including the evaluation of field duplicate results if they will be collected.
- 2. Appendix A, Sampling Strategy and Methodology, page 3 of 11.

- a. The project purpose is described as obtaining adequate data to allow an evaluation of the facility to develop specifications for protecting human health and the environment. However, it is not clear what this statement means in terms of data use.
  - i. How was adequate data determined?
  - ii. Will the data be compared to a standard or some action level and if so, what is that standard or action level? What action might be taken if the standard or action level is exceeded? See also page 4 which refers to determining impacts of previous operations on groundwater but does not describe how impacts to groundwater will be defined.
  - iii. Is the goal simply to determine presence/absence of the contaminants at the laboratory's achievable reporting/detection limits?
  - iv. Has it been verified the achievable reporting/detection limits for the chosen method are acceptable for this project?
- b. Although an assumption can be made, how were the locations for the six DPT borings and the one permanent monitoring well chosen over other possible locations?

## **General Comments**

- 3. § 3.1 Assessment and Response Actions, page 4 of 5. Please note it is more appropriate to refer to SOPs 2430.14 and 2430.16 for additional details on assessments and response actions for the Regional Laboratory rather than 2430.12.
- 4. Appendix A, Sampling Strategy and Methodology, page 3 of 11. If there are any standards or specific procedures to be applied for the collection of GPS data, it would be useful to note that here.
- 5. Appendix A, Well Development and Well Sampling, page 8 of 11. It should be noted that the well development and purging described in the QAPP differs slightly from the referenced SOPs when it comes to monitored water quality parameters. It is assumed the description in the QAPP takes precedence, but this should be verified prior to sampling.
- 6. Appendix A, Quality Control Sampling, page 9 of 11. Although not specifically stated here, it is assumed that because the QAPP states the QC samples will be analyzed for the same contaminants as the field samples, this also means they will be handled in the same way which will not only include keeping the QC samples cool but also preserving them with HCl.

If you have any questions, please contact me at x7258.

R7QAO Document Number: 2020006